

# Exhibit F

**UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

*Ashton, et al. v. Al Qaeda Islamic Army, et al.* No. 02-CV-6977

*Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, No. 03-CV-5738

*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al.*, No. 04-CV-05970

*Federal Insurance Col, et al. v. Al Qaida, et al.*, No. 03-CV-6978

*Euro Brokers v. Al Baraka Investment and Development Corp., et al.*, No. 04-CV-7279

*Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp.*, et al,  
No. 04-CV-1923

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp.*, et al., No. 04-CV-07280

**DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA'S  
SUPPLEMENTAL RESPONSES TO PLAINTIFFS' FOURTH REQUEST FOR  
PRODUCTION OF DOCUMENTS**

Defendant World Assembly of Muslim Youth Saudi Arabia ("WAMY Saudi Arabia"), through undersigned counsel, hereby responds to Plaintiffs' Request for Production of Documents.

**GENERAL OBJECTIONS**

1. Defendant WAMY Saudi Arabia objects to plaintiffs' "Definitions" and Document Requests insofar as they:
  - a. Request information or identification of documents concerning confidential communications between defendant and its attorneys, on the grounds that the information sought is protected under the attorney/client privilege;
  - b. Request information or identification of documents prepared by Defendant's counsel for their own use, or prepared by Defendant or Defendant's witnesses

for use by Defendant's counsel, on the grounds that the information sought is protected from disclosure by the attorney work-product doctrine;

- c. Seek to enlarge Defendant's obligation to respond to discovery beyond the obligations established by the Federal Rules of Civil Procedure and the Local Rules of this Court;
  - d. Seek information or documents to which plaintiffs have an equal or greater access than Defendant.
  - e. Seek information or documents prior to the year 1992 pursuant to Judge Daniel's Order of December 21, 2007 (Docket No. 2059) limiting discovery relating back to the period beginning in 1992.
2. Defendant has made a diligent and reasonable search and inquiry for the information requested by the requests. Any response contained herein, however, is given with the understanding that WAMY Saudi Arabia and its attorneys are still conducting discovery and investigation in connection with this action. Defendant's responses are therefore without waiver of, or prejudice to, its right to later use additional information not set forth or referred to in this response. In addition, any response contained herein is made with the express reservation of all rights pursuant to the Federal Rules of Civil Procedure and Local Civil Rules of this Court to supplement or amend these responses or to present evidence either discovered subsequent to the date hereof, or the significance of which is later discovered.
3. In its specific responses below, Defendant's statement that responsive documents will be made available for inspection does not mean that any documents exist.

4. Any documents produced herein designated as “Confidential” shall be subject to Judge Casey’s Order of Protection of October 3, 2006.
5. The above-stated General Objections are hereby incorporated in each of WAMY Saudi Arabia’s following responses to specific requests, whether or not expressly repeated in response to a particular request.

### **DOCUMENT REQUESTS**

1. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between WAMY and Abdullah Omar Naseef and Abdullah al Turki (hereinafter collectively referred to as the “Charity Officials”), including without limitation, all documents relating to all positions the Charity Officials held or hold within WAMY. Responsive documents shall include, but are not limited to, their personnel or employment files.

#### **ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

2. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged involvement of any branch office, official, employee, or representative of WAMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

#### **ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

3. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged involvement of any branch office, official, employee, or representative of W AMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

4. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

5. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

6. Please provide all documents relating to any allegation that any of the Charity Officials were involved in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

7. Please provide all documents relating to any meeting between any of the Charity Officials and any representative of the Saudi government or any foreign government.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

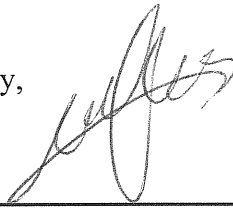
8. Please provide all documents relating to any meeting between any of the Charity Officials and any representative of any separatist or independence movement or organization.

**ANSWER:**

Defendant WAMY Saudi Arabia incorporates its general objections. Without waiving any other specific objections, WAMY Saudi Arabia further objects to this request on the grounds that it is untimely, as the document production deadline expired as of August 30, 2012.

Dated: September 19, 2013

Sincerely,



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Omar T. Mohammedi, Esq.  
Law Firm of Omar T. Mohammedi, LLC  
Woolworth Building  
233 Broadway, Suite 801  
New York, NY 10279

/s/ Frederick Goetz  
Frederick Goetz, Esq.  
Goetz & Eckland P.A.  
Exposition Hall at Riverplace  
43 Main Street S.E., Suite 505  
Minneapolis, Minnesota 55414  
612-874-1552  
612-331-2473 (fax)  
[www.goetzecklandlaw.com](http://www.goetzecklandlaw.com)

*Attorneys for World Assembly of Muslim Youth Saudi  
Arabia and World Assembly of Muslim Youth International*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19<sup>th</sup> day of September 2013, I caused a copy of Defendants World Assembly of Muslim Youth Saudi Arabia's Supplemental Responses to Plaintiffs' Fourth Request for Production of Documents to be produced and served by Federal Express upon:

Sean Carter  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
([SCarter1@cozen.com](mailto:SCarter1@cozen.com))  
For the Plaintiffs' Executive Committees

  
Heela Masood